

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**JOSEPH SIMMONS,**

**Plaintiff,**

**v.**

**CITY OF PHILADELPHIA, et al.,**

**Defendants.**

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**Civil Action  
No. 22-1644**

**OFFER OF JUDGMENT**

**TO: Nia Holston, Esq.**

Abolitionist Law Center

990 Spring Garden

Philadelphia, PA 19123

*Attorney for Plaintiff Joseph Simmons*

**John Coyle, Esq.**

McEldrew Purtell

123 S. Broad St., Ste. 2250

Philadelphia, PA 19109

*Attorney for Plaintiff Joseph Simmons*

Pursuant to Federal Rule of Civil Procedure 68, Defendants the City of Philadelphia, Blanche Carney, Michele Farrell, Jessie Wilson, Fitzgerald Dick, Alfred Lebesco, Lovell Crawford and Charmaine Campbell, by and through their attorneys, Emily Hoff, Assistant City Solicitor, and Derek Kane, Deputy City Solicitor, hereby offer to allow Judgment to be taken against the City of Philadelphia only and in favor of the Plaintiff, Joseph Simmons, for all claims for damages, costs, attorneys' fees and interest accrued to date, in the amount of One-Hundred and Fifty Thousand and 00/100 Dollars (\$150,000.00).

This Offer of Judgment is made solely for the purposes specified in Federal Rule of Civil Procedure 68 and is not to be construed either as an admission that the Defendants are liable in this action, or that the Plaintiff has suffered any damages. Said judgment is to have no effect whatsoever except in settlement of this case. Additionally, this Offer of Judgment is not admissible

as evidence in any proceeding, except, if rejected, in a proceeding to determine costs. If this Offer of Judgment is not accepted in writing within fourteen (14) days, it shall be deemed withdrawn.

Date: April 2, 2025

/s/ Emily M. Hoff  
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